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Sent: Friday, February 4, 2011 9:41 AM
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Subject: Near-term storm preparation at WGS�

Joe,

We are reviewing the submittals you provided on 1 February 2011 in response to our Administrative Order on Consent ("AOC") and our 28 January 2011 e-mail that conditionally approved re-opening of cell E6 at the Waimanalo Gulch Sanitary Landfill ("WGS�"). I anticipate sending you our detailed feedback on those work plans and schedules by the latter part of next week.

However, in light of "heavy rain" being forecasted by NOAA for the vicinity of the WGS� this coming weekend, we are providing the below interim comments on your "[Revised Storm Water Management Update & Contingency Plan](#)," ("contingency plan") and would like your written response to these today. These particular comments generally concern near-term preparation for storm events and are either items that lack detail or are absent in the contingency plan Waste Management of Hawaii ("WMH") submitted on 1 February.

- (1) Please provide details on WMH's process for deciding when Cell E6 operations are to be shut-down due to rain storm events and how such a shut-down would be executed.
- (2) Please provide a description of how WMH would secure waste within Cell E6 in anticipation of a significant rain event.
- (3) Please inform us of the status (e.g., flanged or otherwise shut and secured) of the 36-inch diameter fiberglass manhole that connects to the 78-inch Hobas pipe, that is located just upstream of the temporary earthen berm that is directly downstream of Cell E6.
- (4) The contingency plan states, under item 5), that "The sedimentation basin, temporary berm in the Cell E6 area, 36 inch storm water diversion piping, and general facility drainage ditches will be monitored and maintained during potential storm events." Please describe the type and frequency of monitoring that will be performed, who will perform the monitoring, including after normal work hours (WMH's security service?).

I will give you a call in approximately an hour to discuss, but feel free to call me sooner.

We appreciate your cooperation.

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